

January 24, 2022

VIA ECF

Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Application GRANTED. The initial pretrial conference, currently scheduled for **March 7, 2022**, is adjourned to **April 25, 2022**. The parties must contact the Court-annexed Mediation Program to reschedule their mediation session. The Clerk of Court is directed to terminate ECF No. 15. SO ORDERED.



Re: Pulliam v. Red Apple Media, Inc., 1:21-cv-10301 (JMF)

January 25, 2022

Dear Judge Furman:

Pursuant to section 1.F of the Court's Individual Rules and Practices, the parties jointly and respectfully move for an adjournment of the mediation session, currently scheduled for February 16, 2022, as well as the initial case management conference ("ICM") scheduled for March 7, 2022 so as to allow time to substitute and serve a new defendant.

- (1) the original date of the mediation session is February 16, 2022, and original date of the ICM is March 7, 2022
- (2) no previous requests for an adjournment have been made;
- (3) no previous requests have been granted or denied;
- (4) by joint stipulation, filed concurrently herewith, Plaintiff intends to amend her complaint to dismiss the current defendant, Red Apple Media, Inc., and substitute a new defendant; accordingly, Plaintiff respectfully requests additional time to serve the new proposed defendant, NY Radio Assets, LLC, and provide it the opportunity to respond. Plaintiff respectfully submits that an adjournment of approximately 45 days of the ICM (and corresponding mediation session) would be warranted;
- (5) the currently named defendant consents to the requested relief;
- (6) the mediation has been set for February 16, 2022 at 10:00 a.m. and the ICM is scheduled for March 7, 2022 at 3:30 pm;

Respectfully Submitted,

s/jameshfreeman/
James H. Freeman

Counsel for Plaintiff

s/nicoleamandabrandofino/
Nicole-Amanda Brandofino

Counsel for Defendant